



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 11, 2012

ALMA GONZALEZ, TREASURER
DEMOCRATIC EXECUTIVE COMMITTEE OF
FLORIDA
214 SOUTH BRONOUGH STREET
TALLAHASSEE, FL 32301

Response Due Date
05/16/2012

IDENTIFICATION NUMBER: C00005561

REFERENCE: AMENDED YEAR-END REPORT (12/01/2011 - 12/31/2011), RECEIVED
02/17/2012

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Your 2011 reports combined disclose memo Schedule A's totaling \$226,026.90 for "Swing State Victory Fund" which appears to be your committee's share of the gross contributions received from a joint fundraising committee. However, there are no corresponding transfers-in from the related joint fundraising committee disclosed on Schedule A supporting Line 12 of the Detailed Summary Page. Please amend you report(s) to clarify this apparent discrepancy. (11 CFR §102.17(c)(8)(i)(B))

2. The Detailed Summary Page, on Line 18(a) Column A of your Amended 2011 November Monthly (10/1/11-10/31/11), received 2/17/12, Amended 2011 December Monthly (11/1/11-11/30/11), received 2/17/12, and Amended 2011 Year-End (12/1/11-12/31/11), received 2/17/12 Reports combined, disclose \$212,936.13 in transfers from the non-federal account for allocated activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$207,699.84 as the non-federal share for allocated activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for allocated activity, transfers for allocated activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. (11 CFR §§106.6(e)(2) and 106.7(f)(2)) Please clarify the nature of the transfers-in from the non-federal account.

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The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

3. Schedule B supporting Line 21(b) of your report discloses a payment(s) for "On-Line Voter File Access," and "Voter File," which appears to be disclosed on the wrong line of the Detailed Summary Page. Please be advised that Voter Identification, Generic Campaign and Get-out-the-vote activity conducted in connection with an election in which one or more candidates for Federal office appear on the ballot is considered to be Federal Election Activity. (11 CFR §100.24) Please amend your report to properly disclose this activity on Line 30(b) or provide clarification regarding this activity.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1164.

Sincerely,



Nicole Miller
Senior Campaign Finance Analyst
Reports Analysis Division